Message

From: Fife, Greg [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP

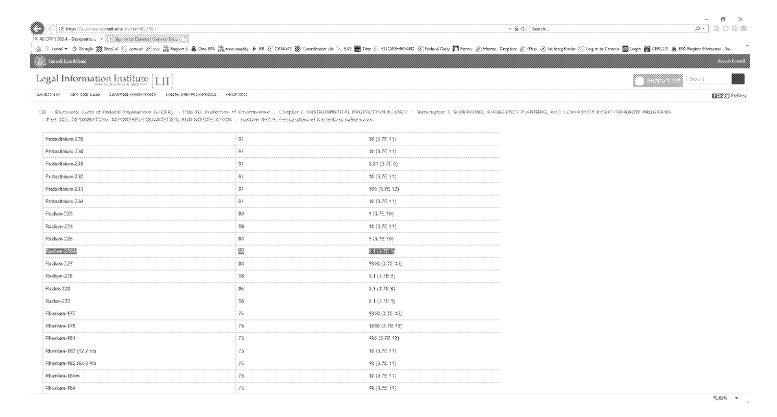
(FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=1EBD5B1EB9104F3E93818DB928C8A313-FIFE, GREG]

Sent: 4/29/2019 3:48:45 PM

Subject: lowerline draft action memo.docx **Attachments**: lowerline draft action memo.docx

With regard to whether Radium-226 is a hazardous substance versus a pollutant or contaminant: Part 302.4 includes Radionuclides and then in Appendix B, the radionuclides are listed with specific RQs, etc.. I'd suggest the following addition in red.

Radium-226 is a radionuclide and a hazardous substance according to section 101(14) of CERCLA, 42 U.S.C. § 9601(14) and 40 C.F.R. § 302.4, specifically Appendix B. *See* Attachment 2, Material Safety Data Sheet for Radium.



If there is a question bou